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4 Attorney for Defendant, Israel Morales-Amaro

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8 UNITED STATES DISTRICT COURT

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SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 ) Case No. 08CR0641-JLS

12 Plaintiff,

13 ) ) NOTICE OF MOTION AND

vs.

14 ) ) MOTION TO:

15 ISRAEL MORALES-AMARO,  
PABLO GUZMAN-ZACARIAS,

16 ) ) 1) COMPEL FURTHER DISCOVERY; AND

Defendants.

17 ) ) 2) LEAVE TO FILE FURTHER MOTIONS

18 ) )

19 ) ) DATE: 4/11/08

20 ) ) TIME: 1:30 p.m.

21 ) )

22 ) )

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY and

SABRINA FEVE, ASSISTANT UNITED STATES ATTORNEY:

23 )

24 )

25 NOTICE OF MOTION

26 PLEASE TAKE NOTICE that on April 11, 2008 at 1:30 p.m., or as soon thereafter

27 as Counsel may be heard, the Defendant, ISRAEL MORALES-AMARO, by and through his

28 counsel, Donald A. Nunn, will ask this Court to enter an order granting the motions listed

below.

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29 )  
30 )

1 **MOTION**  
2

3 ISRAEL MORALES-AMARO, the Defendant in this case, by and through his attorney,  
4 Donald A. Nunn, pursuant to the Fourth, Fifth and Sixth Amendments to the United States  
5 Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and  
6 local rules, hereby moves this Court for an order to:

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- 1) Compel Discovery; and
  
8 - 2) Leave to file further motions.

  
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10 This motion is based upon the instant motion and notice of motion, the attached  
11 statement of facts and memorandum of points and authorities, and any and all other matters that  
12 may come to this Court's attention prior to or at the time of the hearing on this motion.

13  
14 Date: March 14, 2008

15 Respectfully submitted,

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17 s/Donald A. Nunn  
18 Donald A. Nunn,  
19 Attorney for Defendant ISRAEL MORALES-  
20 AMARO  
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**CERTIFICATE OF SERVICE**

I, Donald A. Nunn declare that:

I am, and was at the time of service of the papers herein referred to, over the age of 18 years and not a party to this action; and I am employed in the County of San Diego, California. My business address is 13426 Community Road. Poway, California.

I caused to be served by electronic mail on March 14, 2008:

NOTICE OF MOTION AND MOTION TO COMPEL FURTHER  
DISCOVERY AND FOR LEAVE TO FILE FURTHER MOTIONS

to the following:

- **John C Ellis , Jr**  
john\_ellis@fd.org,marylou\_belteton@fd.org
- **Neil R Trop**  
neiltroplaw@hotmail.com
- **U S Attorney CR**  
Efile.dkt.gc2@usdoj.gov

s/Donald A. Nunn